MR. BRADLEY: Good afternoon. I'm Philip Bradley, chairman of the Public Utility Commission of South Carolina. Thank you for the opportunity to speak to you today. I'm here on behalf of the National Association of Regulatory Utility Commissioners, NARUC, and the state of South Carolina.

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2... The DEIS evaluates two scenarios of what is called the no-action alternative, which it says provides a baseline for comparison with proposed action. In both scenarios, storing waste at the plant sites for 10,000 years, scenario one; and storing waste at the plant sites for 100 years, scenario two, the spent fuel remains at the plant sites. Currently more than 38,500 metric tons of uranium are stored on site at 72 commercial nuclear power plants in 36 states. Additional high-level radioactive waste is stored at five DOE sites. In scenario one the waste remains at the current sites under institutional controls for 10,000 years with repackaging approximately every 100 years. Nearly five trillion dollars would be required for canister replacement. According to the cost estimates in the DEIS, this scenario is double the cost of storing the waste on site for 100 years under institutional controls, scenario two. In human terms, an additional three latent cancer deaths would occur in the exposed population and 28 additional latent cancer deaths in the population of on-site workers. This is substantially more radiation-related cancer deaths than occur if the repository is completed in the

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2 cont. Yucca Mountain site.

Scenario two is not as financially burdensome. Waste remains at the plant sites under institutional controls for only 100 years, but the waste still remains at the plant sites for 10,000 years. For the first 100 years, the costs of scenario one and two are the same. However, the number of people who would be affected by the migration of radioactive materials is far greater. In scenario two, additional latent cancer deaths in the exposed population increase to 3,300 with 12 additional latent cancer deaths in the on-site worker population. Such high numbers of latent
5 cancer deaths are unacceptable. The DEIS stipulates that neither scenario would be likely if there were a decision not to develop a repository at Yucca Mountain. However, the DEIS states that under any future course that would include continued storage, both commercial and DOE sites have an obligation to continue managing the spent nuclear fuel and high-level radioactive waste in a manner that protects the public's health, safety and environment. This does not give me much assurance or comfort that the no-action is for baseline comparison only.

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3... Nuclear power accounts for 36 percent of electrical generation capability and 57 percent of electric consumption in South Carolina. Our rate payers have paid nearly $550 million into the fund. More than 2,750 metric tons of uranium, of spent nuclear fuel, is stored in pools or dry-cask containers at four reactor sites in South Carolina. Because of storage capacity limitations Carolina Power and Light, CP&L, is currently transporting spent nuclear fuel from its Robinson plant in South Carolina to its Harris plant in North Carolina. CP&L is now seeking NRC approval to expand storage facilities at the Harris plant. Duke Power will need additional storage capacity for its Catawba plant prior to 2006.

Without additional storage capacity the nuclear plants will be required to shut down prematurely or would be prohibited from renewing their operating licenses. Additional financial burden will be placed on the South Carolina rate payers, who will have to absorb through the increased electric rates some or all of these additional unintended storage costs. If the nuclear plants are forced to shut down prematurely or cannot renew their operating licenses, the rate

3 cont. payers will have to pay the cost of replacement power. South Carolina rate payers would still continue paying approximately 40 million per year into the Nuclear Waste Fund as long as the nuclear plants continue to operate.

MR. LAWSON: Thirty seconds.

4 MR. BRADLEY: More than 100 metric tons uranium, of high-level radioactive waste, is stored at DOE's Savannah River site. This is approximately 36 percent of the total inventory of high-level radioactive waste in the nation. The Savannah River site is unacceptable as a repository. It borders the Savannah River, it's located near a major underground aquifer that provides water as far away as Florida, it is in an earthquake zone, and it's located in a populous and rainy area.

1 I conclude by stating that nothing in the DEIS would preclude the development of a permanent nuclear waste repository at Yucca Mountain. The no-action is not an option and should be summarily rejected. Spent nuclear fuel cannot remain at the plant sites and must be removed to a central repository. Currently, high-level nuclear wastes from all over the United States and foreign

countries is safely transported to the Savannah River site. Spent nuclear fuel is being safely transported from South Carolina into North Carolina. Nationally, electric rate payers have paid about $16 billion to develop a repository, and South Carolina rate payers have paid nearly 550 million. Savannah River is not acceptable as an interim or permanent storage site because of health, safety and environmental reasons. Thank you for your time, and I apologize for running over.

MS. SWEENEY: Thank you.

MR. LAWSON: That's all right, thank you. Our next speaker is Gene Hanes -- do I have that correct? -- to be followed by David Jones and -- I'm sorry; on the next one I don't have the first name. I want to say Debra -- but it could be something else -- Livingston. Sorry about that.